



FUNDING APPLICATION

Section 5310 Grant: Enhanced Mobility of Seniors and Individuals with Disabilities

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BACKGROUND

This program (49 U.S.C. 5310) provides formula funding to states for the purpose of assisting Federal Transit Authority (FTA) funding recipients and private non-profit groups in meeting the transportation needs of older adults and people with disabilities. Especially in cases where the public transportation service provided is unavailable, insufficient, or inappropriate in meeting these needs.

Section 5310 aims to improve mobility for seniors and individuals with disabilities by removing barriers to transportation services and expanding mobility options. This program supports transportation services planned, designed, and carried out to meet the special transportation needs of seniors and individuals with disabilities in all areas – large urbanized (over 200,000), small urbanized (50,000-200,000), and rural (under 50,000). Eligible projects include both “traditional” capital investment and “nontraditional” investment beyond the Americans with Disabilities Act (ADA) complementary paratransit services.

FUNDING AVAILABILITY

The amount of funding available through this call for applications is \$890,764, a combination of available funds from Fiscal Year 2025 (\$400,121) and Fiscal Year 2026 (\$411,042).

ELIGIBILITY OVERVIEW

ELIGIBLE APPLICANTS

Section 5310 is a formula grant program for member jurisdictions in the Triangle West Transportation Planning Organization area. This includes organizations located in Hillsborough, Carrboro, Chapel Hill, Durham and a portion of northeast Chatham County. Applicants may include state or local government authorities; private non-profit organizations; and operators of public transportation services including private operators of public transportation services. Potential grantees must submit projects that either begin or end within the boundaries of Triangle West TPO, preferably projects intended to serve residents of the TPO area.

Section 5310(b) provides that the following organizations are eligible to apply for *traditional* section 5310 projects (see description below):

- a. A private non-profit organization; or
- b. A state or local government authority that:
 - a. Is approved by the state to coordinate services for seniors and individuals with disabilities; or
 - b. Certifies that there are no non-profit organizations readily available in the area to provide that service.

Eligible sub recipients for *other* eligible Section 5310 activities include a state or local governmental authority, a private nonprofit organization, or an operator of public transportation that receives a Section 5310 grant indirectly through a recipient.

Please Note: *All organizations or business entities receiving 5310 funds must have a Unique Entity ID (UEI). This UEI is replacing the DUNS number previously required.* The UEI is a twelve-character alphanumeric value managed, granted, and owned by the U.S Government that provides a unique identification for business entities. If you previously had a DUNS number from SAM.gov, you will see that your UEI has replaced your DUNS number.

If you didn't previously have a DUNS number and do not have a UEI, you can register for one on <https://sam.gov/content/entity-registration>.

Triangle West TPO will allow organizations to apply without the UEI but will not be able to disburse any grant funds until the UEI is provided.

ELIGIBLE USE OF PROGRAM FUNDS

Section 5310 program funds are intended to fund innovative and flexible programs that identify the transportation needs of individuals with disabilities and older adults. Therefore, it is expected that 5310 funds be directed to meet these needs by funding new programs and services or to continue existing programs.

ELIGIBLE PROJECTS AND ACTIVITIES

5310 funds may be used for the planning, capital or operating costs of services and facilities that improve mobility for seniors and persons with disabilities.

Eligible projects can fall into one of two categories: traditional and non-traditional investments.

Eligible "Traditional" investments include:

- Buses and vans
- Wheelchair lifts, ramps, and securement devices
- Transit-related information technology systems, including scheduling/routing/one-call systems
- Mobility management programs
- Acquisition of transportation services under a contract, lease, or other arrangement in the case where this is considered more cost effective according to federal formulas.

At least 55% of these "traditional" project funds must be used on public transportation projects that are planned, designed, and carried out to meet the needs of seniors and individuals with disabilities when public transportation is insufficient, inappropriate, or unavailable.

Eligible non-traditional investments beyond the Americans with Disabilities Act (ADA) complementary paratransit services include:

- Travel training
- Training of drivers or aides for increased ability to serve seniors and people with disabilities
- Volunteer driver programs
- Building an accessible path to a bus stop, including curb-cuts, sidewalks, accessible pedestrian signals or other accessible features
- Improving signage or way-finding technology

- Incremental cost of providing same-day service or door-to-door service
- Removal of barriers to bus stops or transit
- Purchasing vehicles to support new accessible taxi, ride sharing, and/or vanpooling programs
- Expansion of paratransit service beyond the ¾ mile buffer zone required by ADA
- Expansion of service hours for ADA paratransit beyond hours of fixed-route services
- Incremental cost of providing same day service; incremental cost of making door-to-door service available to all ADA paratransit riders
- Mobility management programs*

*Mobility Management is an eligible capital cost. Activities may include: promotion and enhancement of access to transit services; short term management activities for planning/implementation of coordination; support of local coordination bodies and councils; operation of transportation brokerages to coordinate providers; provision of coordination services such as travel training and trip planning for customers; development and operation of one-stop travel call centers; eligibility management; operations and planning using intelligent transportation technology (GIS, GPS, coordinated vehicle scheduling/dispatch/monitoring, coordinated billing, and single smart customer payment systems). The purchase of technology is also an eligible capital expense.

Up to 45% of program funds may be used for these non-traditional public transportation projects that exceed the requirements of the ADA, improve access to fixed route service and decrease reliance on paratransit service, or provide alternatives to public transportation that assist seniors and individuals with disabilities with transportation.

COST SHARING/MATCH REQUIREMENT:

The Section 5310 grant program requires a local match to ensure projects are 100% funded. The FTA's contribution varies according to project type (please see below). Non-DOT funds and local and private funds can be used as the local match. Examples of the types of programs that are potential sources of local match include: employment, training, aging, medical, community services, and rehabilitation services. Funds can be used to support:

- Capital Projects – 80% Fed/20% Local Match
- Operating – 50% Fed/ 50% Local Match
- ADA vehicle-related equipment (on and attached to the vehicle) – 90% Fed/ 10% local

CALL FOR PROJECTS AND APPLICATION SCHEDULE

July 21 st – August 25 th , 2026	Advertising & solicitation for applications
August 25th 2026	Application deadline: 2:00 pm to Colleen McGue at Colleen.McGue@twtpo.org
August 25 th – September 29 th 2026	Triangle West TPO staff reviews and scores proposals; selects projects for recommendation
October 13 th , 2026	TC action on FY2026 Program of Projects recommendations
October 27 th , 2026	Board action on FY2026 Program of Projects recommendations
October-November 2026	Notification of funding is conveyed to sub-

	recipients, federal grant application process is completed, and funding packages are distributed.
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PROJECT SELECTION FOR 5310 GRANTS:

Projects will be awarded through a competitive selection process according to the following steps:

1. Applications are received by Triangle West staff.
2. Triangle West staff pass the applications to the Selection Subcommittee
3. The Selection Subcommittee reviews and scores the applications.
4. The Selection Subcommittee makes a recommendation that is presented to the Triangle West Technical Committee.
5. The Technical Committee reviews the proposed projects. The Technical Committee will make their own recommendation to the Triangle West Board.
6. The Triangle West Board votes on the funding of recommended projects.
7. The final list of approved projects is published and submitted to the Federal Transit Authority for funding.

Note: All proposals should reflect the public transportation and human service transportation priorities and projects documented in the Coordinated Public Transportation-Human Services Transportation Plan. Triangle West TPO recently updated the ADA Transition Plan, which includes additional information about the transportation needs of people with disabilities in our region. [By clicking on this link, you will be taken to the website for the Coordinated Public Transit-Human Services Transportation Plan.](#) [By clicking on this link, you will be taken to the ADA Transition Plan web page of Triangle West TPO.](#)

REQUIRED DOCUMENTS

Applicants shall submit the following documentation to the TWTPPO as part of their application:

1. Complete forms for project description/detail and budget and timeline/milestones.
2. FTA Certifications and Assurances, which should be completed annually for each new federal fiscal year, beginning on October 1.
3. Proof of acceptable audit in accordance with the latest Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards (Uniform Guidance) if \$750,000 or more of federal funds are expended on an annual basis (includes all federal sources).
4. Construction projects/environmental requirements (e.g., Categorical Exclusions, State Historic Preservation Office, etc.).
5. List of any revenue vehicles and/or changes to existing fleet plan.
6. A confirmation letter indicating that sufficient local match funds will be available that identifies revenue sources and amounts for local match funds; includes specific amounts as shown in the project budget; and is signed by an authorized representative of the organization submitting the application.

SCORING CRITERIA

The following scoring criteria will be used to rate project applications for Section 5310 projects.

- a. *Project Needs/Goals and Objectives (30 points)*: The project should directly address priority transportation needs identified through Triangle West TPO's locally developed Coordinated Public Transportation - Human Services Transportation Plan. Project application should clearly state the overall program goals, objectives, and demonstrate how the project is consistent with the 5310 grant program. The project application should indicate the number of persons expected to be served and the number of trips (or other units of service) expected to be provided.
- b. *Implementation Plan and Evaluation (15 points)*: For all projects, applicants must provide a well-defined service plan and/or capital procurement plan with a description of implementation steps and timelines. The implementation plan should identify key personnel assigned to this project and their qualifications. Project sponsors should demonstrate their institutional capacity to carry out the service delivery aspect of the project as described.
- c. *Project Budget (15 points)*: Projects must submit a clearly defined project budget, indicating anticipated project expenditures and revenues, including documentation of matching funds. Proposals should address long-term efforts and identify potential funding sources for sustaining the service beyond the grant period.
- d. *Partnerships and Program Outreach (25 points)*: Proposed projects will be evaluated based on their ability to coordinate with other public transportation, community transportation and/or social service resources. Projects that include partnerships with non-profits, private business, or other stakeholders will also receive higher points. Project sponsors should clearly identify project stakeholders and how they will keep stakeholders involved throughout the project. Project sponsors should also describe how they would promote public awareness of the project. Finally, letters of support from key stakeholders and/or customers should be attached to the grant application.
- e. *Program Effectiveness and Performance Indicators (10 points)*: The project will be scored based on the project sponsor's ability to demonstrate that the proposed project is the most appropriate match of service delivery to the need. The application should also reflect how the proposed plan is a cost-effective approach. Project sponsors must also identify clear, measurable, and outcome-based performance measures to track the effectiveness of the service in meeting the identified goals. A plan should be provided for ongoing monitoring and evaluation of the service, including steps to be taken if original goals are not achieved. Sponsors should describe their steps to measure the effectiveness and magnitude of the impact that the project will have on target markets (i.e., persons with disabilities or seniors).
- f. *Innovation (5 points)*: The project will be examined to see if it contains innovative ideas (service concepts, facilities, creative financing, or new technologies) that have the potential for improving access and mobility for the target populations and may have future application elsewhere in the region.

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4. Construction projects/environmental requirements (e.g., Categorical Exclusions, State Historic Preservation Office, etc.).
5. List of any revenue vehicles and/or changes to existing fleet plan.
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SECTION 5310 PROJECT EVALUATION SCORE SHEET

Agency

Project Name:

Funding Type: ☐ Capital Only ☐ Operating Only

☐ Capital & Operating ☐ Mobility Management/Coordinated Planning

The Selection Committee will be searching for an affirmative answer to each of the following questions to determine grant funding eligibility.

Is the proposed project a non-duplicative service or program?	Yes	No
Are eligible local matching funds identified and available?	Yes	No
Does the project provide benefits to the Durham – Chapel Hill – Carrboro urbanized area?	Yes	No
Is the proposed project a “Traditional Section 5310 Project” or “Non-Traditional Section 5310 Project”? Please Select.	Trad	Non-Trad
Is the agency eligible for the project type selected?	Yes	No
Is the proposed project identified within the CPT-HSTP (a project listed within the plan)?	Yes	No
Is the proposed project targeted toward meeting the transportation needs of seniors and individuals w/ disabilities?	Yes	No

Each proposal will receive a score from the Project Selection Committee according to following criteria

Project Evaluation Criteria	Possible Points	Score
Project Need/Goals & Objectives 30%		
How well does this project address high-priority needs identified in the Coordinated Plan?	20	
How effectively will this project increase the numbers of target market customers served?	10	
Implementation Plan 15%		
What is the quality of the implementation plan?	15	
Project Budget 15%		
How efficiently will the projects provide benefits to the customers (e.g., cost per customer served).	10	
How financially sustainable is the program/service beyond the grant period?	5	
Partnerships, Collaboration, & Outreach 25%		
Does the project maximize resources (coordination with other transit services or local match from other non-DOT Federal programs)?	5	
Does the project partner/collaborate with non-profit, human services agencies, or private business?	10	
What is the quality of marketing/outreach plan?	5	
How widely will the benefits of this project be felt? (more points for region-wide benefits).	5	
Program Effectiveness and Performance Indicators 10%		
What is the quality of the evaluation plan? Are performance monitoring metrics and key performance indicators sound and effective in evaluating the project?	10	
Innovation 5%		
Does the project contain innovative ideas, creative financing, or new technologies that could be applied elsewhere in the region?	5	
TOTALS	100	

SECTION 5310: ENHANCED MOBILITY OF SENIORS AND INDIVIDUALS WITH DISABILITIES FY26 APPLICATION

Application Due: August 25th, 2026 by 2:00 PM – email to:

colleen.mcgue@twtpo.org

Date:

Project Title:

SECTION I: APPLICANT INFORMATION	
Applicant Legal Name	
Contact Person/Title	
Address	
City, State, Zip	
Telephone #	
DUNS #	

Request Type (Check all that apply)				
☐ Continuation of an Existing Project	☐ New Project	☐ Operating	☐ Capital	☐ Mobility Management*

**Application for mobility management funding is encouraged as this funding can be used to assist in program administration through funding staff responsible for administering the program and can be the main point of contact for Triangle West staff.*

Organization Type (Check all that apply)			
☐	Local Government Authority	☐	Private Non-Profit Organization
☐	Public Operator of Public Transportation Systems	☐	Private Operator of Public Transportation Systems

Supplemental Information	
☐	Copy of current IRS W-9 Taxpayer Identification Form (new applicants only)
☐	Service Area/Route Map (if applicable)
☐	Current Letters of Support for Project

Certifications – See Appendix A	
☐	Drug and Alcohol Testing Policy or Drug-Free Workplace Policy
☐	Local Share Certification
☐	Title VI Plan Certification
☐	EEO Certification
☐	Lobbying Certification
☐	Traditional Project Certification Eligibility – Units of Local Government (if applicable)
☐	Private Non-Profit Organization Certification Eligibility (if applicable)

SECTION II: PROJECT UNDERSTANDING

Needs and Benefits

The following questions should be answered for all projects, unless otherwise noted. If you need additional space, please attach as separate document.

1. Project Description (at least 500 words)

2. Estimated number of individuals to be served annually by your project

	Existing – Current Operations	Projected
Seniors 60 years of age and over (Projects Serving Seniors)		
Individuals with Disabilities		
General Public		
Total		

3. Unmet Need

Describe the unmet transportation need that the proposed project seeks to address and the relevant planning effort required. Include the specific community served by this project and provide relevant demographic data and/or maps.

4. Implementation Plan

- a. Describe key personnel assigned to this project. Then, please describe your agency's ability to manage the project.

- b. Provide an operational plan for delivering the service. Include routes and service maps, if applicable, as well as key milestones and an estimated completion date (for capital projects).

5. Partners, Collaboration, and Outreach

Describe how the project will be coordinated with public and/or private transportation and social service agencies. Include information specific to low-income populations and populations with Limited English Proficiency.

6. What is your plan for assessing project performance?

7. Identify some major milestones this project expects to accomplish and the anticipated timeframes.

Milestone	Anticipated Date of Accomplishment

SECTION III: BUDGET REQUEST

1) Operating Budget Request

The project operating budget estimate should be based on actual annual expenditures for existing services. Budgets for new services without an operating history should detail the sources of their

estimated budgets. Applicants who are operating their own services should fill out Items A-D in the Budget Details. Applicants who are contracting for services should only fill out Item E.

Budget Detail Year 1

Estimated Operating Expenses	\$
a. Wages, Salaries & Benefits	\$
b. Maintenance & Repairs	\$
c. Fuel	\$
d. Insurance	\$
e. Contract Services – Specify:	\$
Total Operating Expenses	\$
Less Estimated Revenue (negative number)	\$
Net Operating Cost	\$
Total Section 5310 Funding Request (Expenses must exceed min of \$50,000)	\$
Local Share (50% of net operating cost)	\$

Budget Detail Year 2

Estimated Operating Expenses	\$
a. Wages, Salaries & Benefits	\$
b. Maintenance & Repairs	\$
c. Fuel	\$
d. Insurance	\$
e. Contract Services – Specify:	\$
Total Operating Expenses	\$
Minus Estimated Revenue (negative number)	\$
Net Operating Cost	\$
Total Section 5310 Funding Request (Expenses must exceed min of \$50,000)	\$
Local Share (50% of net operating cost)	\$

Capital Budget Request

	Federal Request	
	Year 1	Year 2
Vehicle(s)	\$	\$
Facility Improvement	\$	\$

Computer Software Hardware/ Technology	\$	\$
Other – Year 1	\$	\$
Other – Year 2	\$	\$
Total Capital Request	\$	\$
Local Share (20%)	\$	\$

Mobility Management Request (Capital)

Major Activities	Federal Request	
	Year 1	Year 2
	\$	\$
	\$	\$
	\$	\$
	\$	\$
	\$	\$
Total Mobility Management Request	\$	\$
Local Share (20%)	\$	\$

Describe how you intend to maintain your project after grant funding ends.

APPENDIX A – CERTIFICATIONS

See next page.

Sample Local Match Certification Letter - Please print on company letterhead

Date

Colleen McGue, Planning Manager
Triangle West TPO
4307 Emperor Blvd, Suite 110
Durham, NC 27703

RE: FY 2026 5310 Application

(Organization/Business Name) is submitting an application for the Enhanced Mobility for Seniors and Individuals with Disabilities funds for (Project name/service).

The purpose of this letter is to serve as the official assurance of the 0% local match required for the project. Sufficient funds are allocated in the budget to provide local match should the grant be approved. This letter serves to certify that of the total project cost of \$000,000 and requires local matching funds in the amount of \$000,000.

Sincerely,

(Name of Finance Administrator/CFO/CEO/etc.)

TITLE VI NON-DISCRIMINATION POLICY STATEMENT SAMPLE

Please attach the corresponding policy for your organization if different from below

It is the policy of (your organization name) to ensure that no person shall, on the ground of race, color, sex, age, national origin, or disability, be excluded from participation in, be denied the benefits of, or be otherwise subjected to discrimination under any program of activity as provided by Title VI of the Civil Rights Act of 1964, the Civil Rights Restoration Act of 1987, and any other related non-discrimination Civil Rights laws and authorities.

_____(signature) _____
Name Date
Company Position

Sample Equal Employment Opportunity Certification
Please attach the EEO policy for your organization if different from below

[Company Name] provides equal employment opportunities (EEO) to all employees and applicants for employment without regard to race, color, religion, sex, national origin, age, disability or genetics. In addition to federal law requirements, *[Company Name]* complies with applicable state and local laws governing nondiscrimination in employment in every location in which the company has facilities. This policy applies to all terms and conditions of employment, including recruiting, hiring, placement, promotion, termination, layoff, recall, and transfer, leaves of absence, compensation and training.

[Company Name] expressly prohibits any form of workplace harassment based on race, color, religion, gender, sexual orientation, gender identity or expression, national origin, age, genetic information, disability, or veteran status. Improper interference with the ability of *[Company Name]*'s employees to perform their job duties may result in discipline up to and including discharge.

Lobbying Certification

You must submit the following certifications if you apply on behalf of your applicant for a Federal grant or cooperative agreement exceeding \$100,000, or a loan (including a line of credit), loan guarantee, or loan insurance exceeding \$150,000, except if you are applying on behalf of an Indian tribe, tribal organization, or other Indian organization or if we determine otherwise in writing.

As required by 31 U.S.C. 1352 and U.S. DOT regulations, "New Restriction on Lobbying," specifically 49 CFR 20.110, you and your Applicant understand that:

- a. The lobbying restrictions of your certification apply your Applicant's request for:
 - (1) \$100,000 or more in Federal funding for a grant or cooperative agreement, and
 - (2) \$150,000 or more in Federal funding for a loan, line of credit, or loan guarantee,
- b. Its certification covers the lobbying activities of:
 - (1) It,
 - (2) Its principals, and
 - (3) Its first tier subrecipients

Therefore, on behalf of your Applicant, you certify to the best of your knowledge and belief, that:

- 1. No Federal appropriated funds have been or will be paid by or on its behalf to any person:
 - a. To influence or attempt to influence:
 - (1) An officer or employee of any Federal agency,
 - (2) A Member of Congress, an employee of a member of Congress, or an officer or employee of Congress,
 - b. Regarding the award of a:
 - (1) Federal grant or cooperative agreement, or
 - (2) Federal loan, line of credit, loan guarantee, or loan insurance
- 2. It will submit a complete OMB Standard Form-LLL, "Disclosure of Lobbying Activities (Rev. 7-97)," in accordance with its instructions, if any funds other than Federal appropriated funds have been or will be paid to any person:
 - a. To influence or attempt to influence:
 - (1) An office or employee of any Federal agency,
 - (2) A Member of Congress, an employee of a Member of Congress, or an officer or employee of Congress, or
 - b. Regarding any application for a:
 - (1) Federal grant or cooperative agreement,
 - (2) Federal loan, line of credit, loan guarantee, or loan insurance, and
- 3. It will include the language of this certification in the award documents for all sub-awards at all tiers including, but not limited to subcontracts, sub-grants, sub-agreements, and third party contracts under a Federal grant or cooperative agreement, or Federal loan, line of credit, loan guarantee, or loan insurance, and
- 4. It understands that:
 - a. This certification is a material representation of fact that the Federal Government relies on, and
 - b. It must submit this certification before the Federal Government may award funding for a transaction covered by 31 U.S.C. 1352, including a:

- (1) Federal grant or cooperative agreement, or
- (2) Federal loan, line of credit, loan guarantee, or loan insurance, and

5. It also understands that any person who does not file a required certification will be subject to a civil penalty of not less than \$10,000 and not more than \$100,000 for each such failure.

Name/Position (printed)

Name (signed)

Date

LOCAL GOVERNMENT AUTHORITY CERTIFICATION For Government Entities Only

For governmental entities to be eligible for the “Traditional – Capital” 5310 funding, the state or local government authority needs to be approved by the State to coordinate services for seniors and individuals with disabilities or certify that there are no non-profit organizations readily available in the area to provide the service. See 49 U.S.C. 5310(b)(1) and (b)(2).

As the authorized representative of

I certify that:

Our agency is approved by the State to coordinate services for seniors and individuals with disabilities

OR

There are no non-profit organizations readily available in the area to provide the service as described in the 5310 application

Signature

Printed Name

Title

Date

PRIVATE NON-PROFIT ORGANIZATION CERTIFICATION ELIGIBILITY
For Private Non-Profit Organizations Only

As a private non-profit organization, [Insert name of non-profit organization] , I have attached to this application our IRS 501(c)(3) letter establishing our eligibility for Section 5310 funding.

Signature

Printed Name

Title

Date

APPENDIX B: ADDITIONAL SUBRECIPIENT MONITORING INFORMATION

SUBRECIPIENT MONITORING:

- 1) Monitoring of subrecipients shall be conducted by the TWTPPO and the City of Durham (Direct Recipient) to ensure that all federal guidelines are being adhered to when using federal funds. A project progress report is required with each invoice along with a detailed accounting of the expenditure of the local match.
- 2) FTA requires City of Durham to take monitoring actions based on 2 CFR 200.332. These are identified in the checklist on page 8.
- 3) In addition to State or Federal program specific monitoring requirements, all monitoring activities should address the following areas:
 - a) All applicable requirements of Title VI of the Civil Rights Act of 1964.
- 4) The applicable core monitoring areas, as defined by the Uniform Guidance. Currently, the core monitoring areas include but are not limited to:
 - a) Activities allowed or unallowed;
 - b) Allowable costs/cost principles;
 - c) Cash management;
 - d) Wage rate requirement;
 - e) Eligibility;
 - f) Equipment and real property management;
 - g) Matching, Level of Effort, Earmarking;
 - h) Period of performance;
 - i) Procurement and suspension and debarment;
 - j) Program income;
 - k) Other FTA specific monitoring areas are defined elsewhere in this document (e.g. Section 10);
 - l) Reporting;
 - m) Subrecipient monitoring; and
 - n) Special tests and provisions.
- 5) At least annually, the TPO or the City of Durham will collect updated information and documentation on subrecipients' financial processes and controls, through either the Uniform Guidance or an annual financial statement when the subrecipient is excluded from Uniform Guidance audit requirements. In addition, the TWTPPO may perform desk audits of a sample of sub-invoices, site visits to review processes, systems and controls, or other procedures as deemed appropriate.
 - a) Subrecipients may be required to repay disallowed costs, make financial adjustments, or take other actions if it is determined through external agency or City of Durham internal audit or review that disallowed costs were reimbursed with 5310 funds. The City of Durham reserves the right to pause payment on reimbursement requests until

- adequate repayment arrangements are made with the subrecipient.
- 6) If an unfavorable audit report has been received from a subrecipient, the appropriate TWTPPO Project Manager will review the checklist to confirm that the subrecipient has provided sufficient documentation. For the elements that are out of compliance, the subrecipient must develop a Corrective Action Plan. The City of Durham and TWTPPO will monitor progress to ensure that the corrective action plan is followed and findings are appropriately resolved by subrecipient. The Corrective Action Plan should cover:
 - 7) What elements are missing or incorrect.
 - 8) What actions need to be taken.
 - 9) A date by which information will be provided.
 - 10) Additional information and recommendations to maintain compliance are included below.
 - 11) Examples of corrective action that can be taken as a result of unfavorable audit reports include but may not be limited to the following:
 - a) Discuss need for special monitoring with Program personnel;
 - b) Ask for extra contact between Program leads;
 - c) Ask for more frequent technical reporting;
 - d) Add more detailed or frequent invoicing requirements;
 - e) Add requirement for expenditure backup materials;
 - f) Tie receipt of technical progress reports or other deliverables to payments;
 - g) Require on-site monitoring (technical and financial)
 - h) Add more stringent termination or stop-work language for failure to comply with requirements.

Checklist of important materials for subrecipient monitoring:

- ☐ Title VI assurances of compliance with the Civil Rights Act of 1964
- ☐ Guarantee of identification of any discrimination related complaints or lawsuits against the grantee

DUE TO THE TPO:

- ☐ Project progress report with each invoice
- ☐ Detailed accounting of expenditure of the local match

The pass-through organization (City of Durham) is required to:

- ☐ Evaluate the recipient's risk of non-compliance with federal statutes and regulations, including:
 - ☐ The subrecipient's prior experience with the same or similar subawards
 - ☐ The results of previous audits including whether or not the subrecipient receives a Single Audit in accordance with Subpart F of this part, and the extent to which the same or similar subaward has been audited as a major program;
 - ☐ Whether the subrecipient has new personnel or new or substantially changed systems; and
 - ☐ The extent and results of Federal awarding agency monitoring (e.g., if the subrecipient also receives Federal awards directly from a Federal awarding agency).

- ☐ Monitor the activities of the subrecipient as necessary to ensure that the subaward is used for authorized purposes, in compliance with Federal statutes, regulations, and the terms and conditions of the subaward; and that subaward performance goals are achieved. Pass-through entity monitoring of the subrecipient must include:
 - ☐ Reviewing financial and performance reports required by the pass-through entity.
 - ☐ Following-up and ensuring that the subrecipient takes timely and appropriate action on all deficiencies pertaining to the Federal award provided to the subrecipient from the pass-through entity detected through audits, on-site reviews, and written confirmation from the subrecipient, highlighting the status of actions planned or taken to address Single Audit findings related to the particular subaward
 - ☐ Issuing a management decision for applicable audit findings pertaining only to the Federal award provided to the subrecipient from the pass-through entity as required by §200.521
 - ☐ The pass-through entity is responsible for resolving audit findings specifically related to the subaward and not responsible for resolving crosscutting findings. If a subrecipient has a current Single Audit report posted in the Federal Audit Clearinghouse and has not otherwise been excluded from receipt of Federal funding (e.g., has been debarred or suspended), the pass-through entity may rely on the subrecipient's cognizant audit agency or cognizant oversight agency to perform audit follow-up and make management decisions related to cross-cutting findings in accordance with section §200.513(a)(3) (vii). Such reliance does not eliminate the responsibility of the pass-through entity to issue subawards that conform to agency and award-specific requirements, to manage risk through ongoing subaward monitoring, and to monitor the status of the findings that are specifically related to the subaward.
 - ☐ Depending upon the pass-through entity's assessment of risk posed by the subrecipient (as described in paragraph (b) of this section), the following monitoring tools may be useful for the pass-through entity to ensure proper accountability and compliance with program requirements and achievement of performance goals:
 - Providing subrecipients with training and technical assistance on program-related matters; and
 - Performing on-site reviews of the subrecipient's program operations;
 - Arranging for agreed-upon-procedures engagements as described in §200.425.
 - ☐ Verify that every subrecipient is audited as required by Subpart F of this part when it is expected that the subrecipient's Federal awards expended during the respective fiscal year equaled or exceeded the threshold set forth in §200.501.
 - ☐ Consider whether the results of the subrecipient's audits, on-site reviews, or other monitoring indicate conditions that necessitate adjustments to the pass-through entity's own records.
 - ☐ Consider taking enforcement action against noncompliant subrecipients as described in §200.339 of this part and in program regulations.